

START



0038734

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

7601 W. Clearwater, Suite 102 • Kennewick, Washington 99336 • (509) 546-2990

August 11, 1994

Mr. Greg Morgan
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352

Mr. Rick Raymond
Westinghouse Hanford Company
P. O. Box 1970
Richland, WA 99352



Dear Messrs. Morgan and Raymond:

Re: Relaxation of Current Emergency Conditions at Tank C-106

During the last week, the U. S. Department of Energy (USDOE) and Westinghouse Hanford Company (WHC) personnel have spent considerable time and effort in establishing appropriate conservative criteria for the relaxation of the current emergency conditions at Tank C-106. A Washington State Department of Ecology (Ecology) representative has been present at many of these discussions and Ecology, in principle, understands and agrees with the proposed conditions.

At a status meeting on August 9, 1994, I raised the concern that it would be inappropriate to approve and implement any relaxation of control conditions at Tank C-106 without setting additional conservative controls for continued monitoring of data available for the tank. Due to the lack of firm, scientifically based knowledge of the conditions within Tank C-106, these standards, when exceeded, would potentially lead to a re-institution of controls upon Tank C-106. A number of theories have been promulgated by members of the Tank C-106 Technical Review Group (TRG) and external consultants and experts. These proposed tank processes, however possible, can not be substantiated or rejected based upon the limited data sources available and the difficulty in obtaining sludge structure and composition data.

Given the lack of data concerning in-tank processes, it will be necessary to monitor Tank C-106 closely until it can be determined either that the current fluctuations pose no threat of release of radioactive materials into the environment, or that the tank has reached new equilibrium conditions based on the data available. In order to help ensure safe operations of Tank C-106, this monitoring will be in addition to and more stringent than the normal tank farm operational controls or procedures.

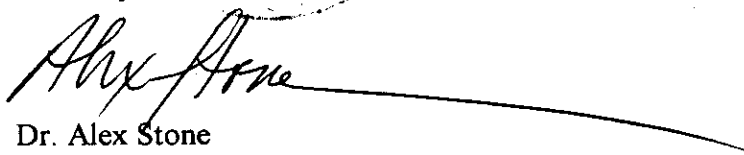
TX-106

Mr. Greg Morgan
Mr. Rick Raymond
August 11, 1994
Page 2

In summary, let me emphasize that Ecology is not opposed to the relaxation of the current emergency conditions surrounding Tank C-106. To do so, however, without having established additional operational monitoring controls is not an acceptable alternative, and Ecology will oppose any such action. Ecology would like to resolve this issue as expediently as possible. Ecology supports and believes the external/internal work groups and the Defense Nuclear Facilities Safety Board (DNFSB) should continue their participation in resolving these important issues. I am very interested in being present for any discussions concerning these new monitoring controls and would be willing to help in any way possible to facilitate this process.

If you have any questions, please call me at (509) 736-3018.

Sincerely,



Dr. Alex Stone
TWRS Safety Team Leader
Nuclear Waste Program

AS:mf

cc: Casey Ruud, USDOE
Tom Sheridan, USDOE
Ami Sidpara, USDOE
Don Veith, USDOE
William Alumkal, WHC
Gary Dunford, WHC
Carol Geier, WHC
Paul Gubanc, DNFSB
Walt Apley, PNL
Al Conklin, DOH
Administrative Record

509-736-3018